

Case 7-1

LAC 25-08-1008 - Privileged and Confidential - Settlement Communication

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE ESTATE OF MARTÍN RAMÍREZ,

by its duly appointed co-administrators and
personal representatives,

MARTÍN RAMÍREZ SALINAS and MARIA
DE JESUS RHYES RAMÍREZ MILLER,

Plaintiffs,

v.

MAUREEN HAMMOND

and

SOTHEBY'S, INC.,

Defendants.

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/2/08

Case No. 08 Civ. 7103 (PKC)

STIPULATION
AND ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED AND AGREED, AS AND AMONG THE PARTIES,
AND ORDERED BY THE COURT:

1. Defendant Sotheby's, Inc. ("Sotheby's") shall release the 17 works of art by Martín Ramírez currently in its possession (the "Property") and subject to dispute in this action only as directed by an order of the Court (including any other federal or state court to which this action may be transferred), but shall not relinquish possession or control of, or transfer, assign, release or otherwise dispose of, the Property until so directed by an order of the Court.

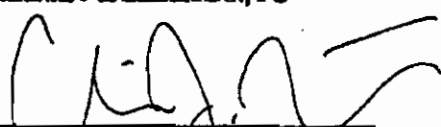

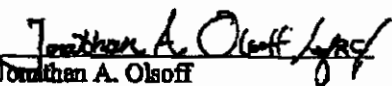
2. Sotheby's is hereby discharged from any and all liability to the other parties in this action and is dismissed from this action and any related actions, with

LAC 25-08-2008 - Privileged and Confidential - Settlement Communication

prejudice, as a party, having hereby waived its right to seek costs and attorneys' fees and indemnity as provided by statute, contract, rule, and common law.

3. This Stipulation may be executed in one or more counterparts. All executed counterparts and each of them shall be deemed to be one and the same.

Dated: August 27, 2008

<p>RABINOWITZ, BOUDIN, STANDARD, KRINKSY & LIEBERMAN, PC</p>  <p>Christopher J. Klatell 111 Broadway, 11th Floor New York, New York 10006 212.254.1111 <i>Attorneys for Plaintiff</i></p>	<p>KIRKLAND & ELLIS LLP</p>  <p>Josef J. Riemer 153 East 53rd Street New York, New York 10022 212.446.4800 <i>Attorneys for Defendant Hammond</i></p>
<p>SOITHEBY'S, INC.</p>  <p>Jonathan A. Olsoff North American General Counsel Senior Vice-President 1334 York Avenue NY, NY 10021 212.606.7432</p>	

Dated: 9-2, 2008

SO ORDERED.

U. S. D. J.